

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

EAGLE HARBOR HOLDINGS, LLC, and
MEDIUSTECH, LLC,

Plaintiffs,

V.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:11-cv-05503-BHS

**STIPULATED MOTION TO FILE
DOCUMENTS UNDER SEAL**

**NOTE ON MOTION CALENDAR:
January 24, 2014**

In accordance with CR 5(g), Eagle Harbor Holdings, LLC and MediusTech, LLC (collectively “Plaintiffs”) and Defendant Ford Motor Company (“Ford”) (collectively “the Parties”) respectfully and jointly request that the Court issue an order authorizing the Parties to file under seal Exhibits 1, 3, 25, and 27 to the Declaration of Alexandra Amrhein (“Amrhein Declaration”), and Exhibits 4-8 to the Declaration of Genevieve Wallace (“Wallace Declaration”), in support of the Parties’ Expedited Joint LCR 37 Discovery Submission Regarding Additional Deposition Time. The material sought to be sealed is listed below.

1. Amrhein Declaration Exhibit 1: Excerpt from the Deposition of Brian Hewitt, dated November 19, 2013.
 2. Amrhein Declaration Exhibit 3: Excerpt from Volume I of the Deposition of Dan Preston, dated December 19, 2013.

3. Amrhein Declaration Exhibit 25: Excerpt from Volume II of the Deposition of Dan Preston, dated December 20, 2013.
 4. Amrhein Declaration Exhibit 27: Excerpt from the Deposition of Tracey Olson, dated January 17, 2014.
 5. Wallace Declaration Exhibit 4: Excerpt from the Deposition of Stephen Ford, dated December 14, 2012.
 6. Wallace Declaration Exhibits 5-8: Excerpts from Volume II of the Deposition of Dan Preston, dated December 20, 2013.

These documents are submitted in support of the Parties' Expedited Joint LCR 37

Discovery Submission Regarding Additional Deposition Time. Plaintiffs designated the transcripts of Mr. Hewitt, Mr. Preston, Ms. Olson, and Mr. Ford “Confidential.” The Parties have stipulated that the sensitive material contained in documents so designated merits filing under seal.

Open discovery is favored in this district, and there is a presumption of access to publically-filed documents. LCR 5(g). The confidential and sensitive nature of the material discussed in these documents, however, is good cause to keep the documents under seal. *See Myhrvold v. Lodsyst Grp.*, LLC, C13-1173 RAJ, 2013 WL 5488791, at *4 (W.D. Wash. Sept. 27, 2013) (party must show good cause to keep documents under seal). The Parties respectfully request that Exhibits 1, 3, 25, and 27 to the Amrhein Declaration, and Exhibits 4-8 to the Wallace Declaration, be sealed.

DATED: January 24, 2014

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**STIPULATED MOTION TO FILE
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**STIPULATED MOTION TO FILE
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Attorneys for Plaintiffs

IT IS SO ORDERED.

Dated this ____ day of January, 2014.

THE HONORABLE BENJAMIN H. SETTLE
United States District Judge

1 **CERTIFICATE OF SERVICE**

2 I certify that this pleading was filed electronically with the Court and thus served
3 simultaneously upon all counsel of record, this 24th day of January, 2014.

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/s/ Duncan E. Manville _____
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CERTIFICATE OF SERVICE - 1
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